## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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§	Civil Action No. 4:09-CV-00326
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## PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Plaintiff Katherine Blummer respectfully files this Unopposed Motion for Leave to Exceed Page Limit in filing her Response in Opposition to Defendant's Motion for Summary Judgment and Brief in Support, and would show:

I.

The Court's Civil Procedures Manual, § 6, provides that memoranda and briefs shall be limited to twenty (20) pages. Plaintiff seeks leave to file a Response in Opposition to Defendant's Motion for Summary Judgment and Brief in Support, which is approximately 90 pages, excluding attachments. The length of this motion and memorandum is necessary because of the number and complexity of the issues, and Plaintiff's motion is required to fully explain and support the issues she raises in this case. Therefore, for the purposes of justice, Plaintiff seeks leave

to file her Response in Opposition to Defendant's Motion for Summary Judgment and Brief in Support in excess of the twenty-page limit.

II.

THEREFORE, for the reasons stated above, Plaintiff moves this Court for leave to exceed the twenty (20) page limit set by the Court's Civil Procedures Manual, § 6, and to allow Plaintiff to file her Response in Opposition to Defendant's Motion for Summary Judgment and Brief in Support in this case.

Respectfully submitted,

/s/ Lucia Romano Ostrom
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ATTORNEYS FOR PLAINTIFF

## **CERTIFICATE OF CONFERENCE**

I hereby certify that on February 22, 2010, I spoke with Defendant's counsel via telephone regarding its contents. Defendant does not oppose this motion.

/s/ Lucia Romano Ostrom
Lucia Romano Ostrom

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2010, a true and correct copy of the foregoing document, in electronic form, was sent to the person listed below in accordance with the Local Rules for the U.S. District Court for the Southern District of Texas:

Michael D. Mitchell Flyn L. Flesher Ogletree, Deakins, Nash, Smoak & Steward, P.C. One Allen Center 500 Dallas Street, Suite 3000 Houston, Texas 77002-4709

/s/ Lucia Romano Ostrom
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